13. (NEW) The virtual community system according to claim 11, wherein a second one of the website-accessing users uses a third one of the user terminals to access the virtual tag community mounted on the website provided by the website-providing user; and

the second one of the website-accessing users accesses the virtual tag community mounted on the website provided by the website-providing user in order to communicate with the first one of the website-accessing users without having to access a specified homepage of the virtual community.

II. REMARKS

This is a full and timely response to the Office Action mailed December 17, 2009. In the present application, claims 1-4, 7-8, and 10-12 are pending. By the present paper, claims 1-4, 7-8, and 10-12 are amended, and new claim 13 has been added. More specifically, claims 1-4, 7-8, and 10-12 have been amended to improve grammar and clarity as more fully explained below.

New claim 13, which depends upon claim 11, has been added to recite that

> "a second one of the website-accessing users uses a third one of the user terminals to access the virtual tag community mounted on the website provided by the website-providing user; and the second one of the website-accessing users accesses the virtual tag community mounted on the website provided by the website-providing user in order to communicate with the first one of the website-accessing users without having to access a specified homepage of the virtual community,"

as supported on page 5, lines 22-26, of Applicant's specification as originally filed.

No new matter has been introduced into the present application as a result of the present amendment.

As the present paper is believed to address all outstanding issued raised in the Office Action of December 17, 2009, a speedy allowance of the pending claims is respectfully requested.

A. The Invention

The present application pertains broadly to a community providing server providing a virtual community for a user who has a user terminal connected to the server via a network, and to a virtual community system providing a virtual community for a user, and to a virtual community providing method, and to a virtual community providing program, such as relates

to a virtual community that may be offered, for example, via the Internet. In accordance with an apparatus embodiment of the present invention, a community providing server is provided that includes features recited by independent claim 1. In accordance with another apparatus embodiment of the present invention, a virtual community system is provided that includes features recited by independent claim 7. In accordance with a method embodiment of the present invention, a virtual community providing method is provided that includes steps recited by independent claim 8. Various other embodiments, in accordance with the present invention, are recited by the dependent claims.

An advantage provided by the various embodiments of the present invention is that a virtual community system, server, method, and/or program is provided that effectuates a virtual community that is more convenient to use and that facilitates effective advertising.

B. The Rejections

Claims 4, 11 and 12 stand rejected under 35 U.S.C. § 112, second paragraph, for allegedly lacking proper antecedent basis.

Claims 1, 2 and 7-12 stand rejected under 35 U.S.C. § 103 as allegedly unpatentable over Matsuda (U.S. Patent Application Publication No. US 2002/0054094 A1, hereafter the "Matsuda Publication") in view of Parry (U.S. Patent Application Publication No. US 2002/0178186, hereafter the "Parry Publication"). Claim 3 stands rejected under 35 U.S.C. § 103 as allegedly unpatentable over the Matsuda Publication in view of the Parry Publication, and further in view of Wu et al. (WO 02/077840, hereafter the "Wu Document"), and further in view of DuVal (U.S. Patent 5,818,836, hereafter the "DuVal Patent"). Claim 4 stands rejected under 35 U.S.C. § 103 as allegedly unpatentable over the Matsuda Publication in

view of the Parry Publication, and further in view of Olivier (U.S. Patent 6,480,885, hereafter the "Olivier Patent").

Applicant respectfully traverses the Examiner's rejections and requests reconsideration of the above-captioned application for the following reasons.

C. Applicant's Arguments

The Examiner objects to claims 1-4 and 7-10 in view of multiple alleged informalities (Office Action, mailed December 17, 2009, at 8, line 15, to 10, line 3). Applicant contends that, in view of the present amendment, these multiple objections have been overcome. Applicant provides the following additional comments with respect to the Examiner's objections regarding claim language.

i. Clarification of Claim Terminology: "User"

In the Office Action of December 17, 2009, at 8, line 15, to 10, line 3, the Examiner objected to alleged discrepancies arising from multiple occurrences of the term "user" in the claims. In previous Amendment (D), Applicant attempted to clarify antecedent basis through introduction of first, second, and subsequent users in the claims. However, at sections 5, 6, 8, 9, and 10 of the Office Action of December 17, 2009, the Examiner raises objections based on informalities arising from this attempted introduction of first, second, and subsequent users in the claims.

By the present paper, Applicant has amended the claims to clarify antecedence of the term "user" and, in particular, to clarify the relationship between website-accessing user(s) and website-providing user(s) registered with the virtual community. Support for the present

amendment of claims 1-4, 7-8, and 10-12 may be found, for example, at 8, line 18, to 10, line 21, of Applicant's original specification, where detailed description is given of how a user capable of accessing network websites (i.e., a "website-accessing user") may also have his own website and may, thus, also be a website-providing user, and how such a website-providing user may register with the virtual community to obtain a community tag that is then inserted into the HTML code of the website-providing user's website, and how this community tag may cause a tag community to be shown on the terminal of the same or another website-accessing user, who visits the website-providing user's website.

ii. Clarification of Claim Terminology: "Portion of the Virtual Community corresponding to the Address of the...User"

At page 4, lines 14-18, of the Office Action of December 17, 2009, the Examiner suggests Applicant replace the phrase "the portion of the virtual community" in the claims with the phrase "the tag community shows a part of a whole map of the virtual community..." in order to advance prosecution of the instant application. Applicants gratefully acknowledge the Examiner's suggestion and have, with the present response, amended the affected claims as suggested by the Examiner. Support for the amended claim language is found, for example, at 10, lines 25-26, of Applicant's specification as originally filed.

In addition, to more clearly indicate the relationship between addresses of website-providing users and parts of the whole map of the virtual community, Applicant has amended the claims with the present response to include descriptions pertaining to "the stored information includes a virtual community address indicating a location of the website-

providing user within the virtual community" and "the part of the whole map corresponds to the virtual community address of the website-providing user."

iii. Response to Claim Rejections Under 35 U.S.C. §112

At page 10, lines 8-9, of the Office Action of December 17, 2009, the Examiner rejects claim 4 alleging insufficient antecedent basis for the term "the third user." With the present amendment, Applicant has amended claim 4, as well as other similar claims, to clarify antecedence of the term "user" as explained above. Thus, claim 4 is now in compliance with 35 U.S.C. §112.

At page 10, lines 10-11, of the Office Action of December 17, 2009, the Examiner rejects claims 11 and 12 alleging insufficient antecedent basis of the phrase "A virtual community system ...." Applicant is puzzled by this rejection by the Examiner. Use of the indefinite article "a" in the body of a claim normally indicates introduction of a new element not requiring antecedent basis. It is even more puzzling that the Examiner appears to require antecedent basis for the preamble of the claim, i.e., a virtual community system, despite the fact that the preamble of dependent claims 11 is consistent with the preamble of independent claim 7, and the preamble of dependent claim 12 is consistent with the preamble of dependent claim 11.

For all of the above reasons, it is unclear to the Applicant how claims 11 and 12 lack antecedent basis. To the extent the Examiner is objecting to use of "a" at the beginning of claims 11 and 12, Applicant has amended these claims so that claims 11 and 12, like all of the other dependent claims, begin with the word "the." While noting that it is standard claim drafting practice to use the word "a" to introduce the subject of a claim preamble regardless

of whether the claim is dependent or independent, Applicant nonetheless makes the present amendment in the interest of procuring a speedy allowance of the presently pending claims.

For all of the above reasons, claims 1-4, 7, 8 and 10-13 are in compliance with 35 U.S.C. § 112.

iv. The Section 103 Rejections

A prima facie case of obviousness requires a showing that the scope and content of the prior art teaches each and every element of the claimed invention, and that the prior art provides some teaching, suggestion or motivation, or other legitimate reason, for combining the references in the manner claimed. KSR International Co. v. Teleflex Inc., 127 S.Ct. 1727, 1739-41 (2007); In re Oetiker, 24 U.S.P.Q.2d 1443 (Fed. Cir. 1992). In this case, the Examiner has failed to establish a prima facie case of obviousness against Applicant's claimed invention because the combination of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent, fails to teach, or suggest, each and every limitation recited by claims 1-4, 7, 8 and 10-13.

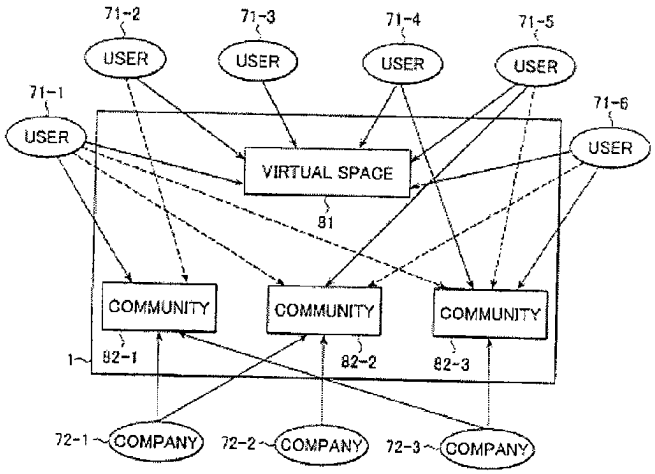
v. The Matsuda Publication

The Matsuda Publication discloses an "information processing apparatus, information processing method, service providing system, and computer program thereof," wherein the invention allows the exchange of community cards within a virtual space, and a display screen shown on the display section of the user terminal device is composed of a virtual space display for displaying three-dimensional objects in a virtual space, and a list window of belongings displayed by the user's own community cards (See Abstract of the Matsuda

Publication, and Figures 7 and 9). The Matsuda Publication discloses that the user can move freely within the virtual space while referring to the virtual space display, and when conversing with other users within the virtual space and when the user wants to let another user participate in the community the user himself belongs to, the user can present community cards corresponding to the avatar, to a user for newly participating in the community, by drag-and-drop of any of the community cards on the avatar (See Abstract of the Matsuda Publication).

A person of ordinary skill in the art would instantly realize that the Matsuda Publication discloses only a conventional virtual community (See, e.g., Matsuda Publication, Figure 5, reproduced below for the Examiner's convenience). The Matsuda Publication does

FIG.5



not teach, or suggest, (i)

> "a control means for issuing a community tag to the website-providing user, wherein the community tag causes a virtual tag community to be mounted on a website provided by the website-providing user when inserted in HTML data constituting the website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein

> the part of the whole map corresponds to the virtual community address of the website-providing user"

as recited by independent claims 1 and 7, and (ii)

> "issuing a community tag, by the community providing server, to a website-providing user, wherein the website-providing user is one of the website-accessing users who accesses the community providing server and registers with the virtual community in order to mount a virtual tag community on a website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to a virtual community address of the website-providing user,"

as recited by independent claim 8, as conceded by the Examiner (Office Action, mailed December 17, 2009, at 12, lines 17-20; and at 16, lines 1-3). The Examiner also admits that the Matsuda Publication does not teach, or suggest, (iii)

> "when the website-accessing user is not logged into the virtual community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state,

as recited by claim 3, and (iv)

> "the user management information database stores a web address of the website provided by the website-providing user, and
> the control means provides the web address of the website provided by the website-providing user to the website-accessing user via the virtual tag community,"

as recited by claim 4 (Office Action, dated December 17, 2009, at 18, lines 9-13; and at 22, lines 1-11). Furthermore, the Matsuda Publication does not teach, or suggest, the subject matter of new claim 13.

In sum, while the Matsuda Publication may disclose a common virtual community, it does not teach, or suggest, a "virtual **tag** community," that "shows a part of a whole map of the virtual community" wherein "the part of the whole map corresponds to the virtual

community address of the website-providing user" according to independent claims 1, 7 and 8 of the instant application.

vi. The Parry Publication

The Parry Publication discloses a "remote URL munging business method" wherein the business method provides a remotely hosted service by an application service provider (ASP) wherein the hosted service is seamlessly integrated into a customer document at a user location (See Abstract of the Parry Publication). According to the Parry Publication, a system for providing the business method includes a combination of novel JavaScript technology and URL munging, wherein, for example, an administrative interface may facilitate the insertion of a line of static JavaScript code into a customer's Web page (See Abstract of the Parry Publication). The Parry Publication discloses that the code may interpret a munged URL and pass the munged URL to an ASP server, and the ASP server may extract session variables that were encoded in the munged URL (See Abstract of the Parry Publication). The Parry Publication discloses that the ASP server may generate a dynamic JavaScript program that displays the hosted service, e.g., a hosted site search engine, and that the hosted service may thereby be written directly into the customer's Web page so that the Web user is not aware that the service is hosted remotely (See Abstract of the Parry Publication). Thus, a person of ordinary skill in the art would instantly realize that the Parry Publication discloses a site search engine that is mounted on a customer's website (See, e.g., Parry Publication, ¶¶ [0098] to [0100]).

In other words, the Parry Publication is limited to disclosing a site search engine that is mounted on a customer's website (Parry Publication, ¶¶ [0098]-[0100]). The Parry

Publication does not teach, or suggest, a virtual **tag** community mounted on a website in accordance with the present invention. Thus, the Parry Publication does not teach, or suggest, (i)

> "a control means for issuing a community tag to the website-providing user, wherein the community tag causes a virtual tag community to be mounted on a website provided by the website-providing user when inserted in HTML data constituting the website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to the virtual community address of the website-providing user"

as recited by independent claims 1 and 7, and (ii)

> "issuing a community tag, by the community providing server, to a website-providing user, wherein the website-providing user is one of the website-accessing users who accesses the community providing server and registers with the virtual community in order to mount a virtual tag community on a website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to a virtual community address of the website-providing user."

as recited by independent claim 8.

As admitted by the Examiner (Office Action, dated December 17, 2009, at 18, lines 9-13; and at 22, lines 1-11), the Parry Publication does not teach, or even suggest, (iii)

> "when the website-accessing user is not logged into the virtual community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state,

as recited by claim 3, and (iv)

> "the user management information database stores a web address of the website provided by the website-providing user, and
> the control means provides the web address of the website provided by the website-providing user to the website-accessing user via the virtual tag community,"

as recited by claim 4. Furthermore, the Parry Publication does not teach, or suggest, the subject matter of new claim 13.

vii. The Wu Document

The Wu Document discloses an "instant messaging system and method" as shown in Figure 1 (reproduced below for the Examiner's convenience), wherein the method and

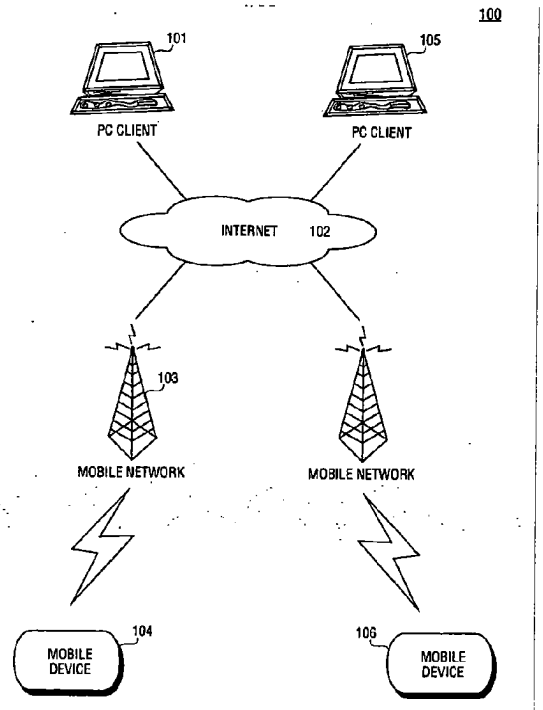


FIG. 1

apparatuses (100) for processing an instant message from a source wireless communication device (104, 106) to a destination device (101, 105) are described (See Abstract of the Wu Document). According to one method embodiment disclosed by Wu, the method includes (a) receiving the instant message from the source wireless communication device, and the instant message has a source wireless communication identifier, a destination instant messenger

identifier, and data contents; (b) extracting the source wireless communication identifier, the destination instant messenger identifier and the data contents from the instant message; (c) retrieving a source instant messenger identifier corresponding to the source wireless communication identifier; (d) binding the source instant messenger identifier with the source wireless communication identifier; and (e) transmitting the data contents with the source instant messenger identifier to the destination device over a communication network, based on the destination instant messenger identifier (See Abstract of the Wu Document).

However, the Wu Document does not teach, or even suggest, (i)

> "a control means for issuing a community tag to the website-providing user, wherein the community tag causes a virtual tag community to be mounted on a website provided by the website-providing user when inserted in HTML data constituting the website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to the virtual community address of the website-providing user"

as recited by independent claims 1 and 7, and (ii)

> "issuing a community tag, by the community providing server, to a website-providing user, wherein the website-providing user is one of the website-accessing users who accesses the community providing server and registers with the virtual community in order to mount a virtual tag community on a website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to a virtual community address of the website-providing user,"

as recited by independent claim 8. As admitted by the Examiner (Office Action, dated December 17, 2009, at 20, lines 18-19), the Wu Document does not teach, or suggest a control means that performs control to show a specific character. Therefore, the Examiner must concede that the Wu Document does not teach, or suggest, that (iii)

> "when the website-accessing user is not logged into the virtual

community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state,

as recited by claim 3. Furthermore, the Wu Document does not teach, or suggest, the subject matter of new claim 13.

viii. The DuVal Patent

The DuVal Patent discloses a "method and apparatus for anonymous voice communication using an online data service," which pertains to an anonymous telephone communication system that includes an anonymous voice system, which can establish an anonymous telephone communication through a circuit switched network (CSN), (See Abstract of the DuVal Patent). The DuVal Patent discloses that, when in operation, (a) two parties place separate telephone calls to the anonymous voice system through the CSN, then (b) the parties enter matchcodes through their telephone keypads, (c) the anonymous voice system compares the matchcodes entered by the parties and connects the telephone calls if the matchcodes match (See Abstract of the DuVal Patent). The system disclosed by DuVal may include an on-line data service that establishes electronic communication between the parties through corresponding data terminals, and the data terminals may have resident anonymous voice input commands that can be selected by the parties (See Abstract of the DuVal Patent). According to the DuVal Patent, the on-line data service transmits a connect command to the anonymous voice system that dials the two parties, or waits for the parties to dial the system, and then connects the parties, and the anonymous voice system sends a disconnect command to the on-line data service when the parties hang up (See Abstract of the DuVal Patent). The disconnect command can be used by the online service to bill the parties for using the anonymous voice service, and the system also stores a couple record during the first

anonymous call recording the matchcode and the telephone numbers of both parties so that, subsequently, either party may initiate an anonymous call to the other party without prior coordination (See Abstract of the DuVal Patent).

However, the DuVal Patent does not teach, or suggest,

> "when the website-accessing user is not logged into the virtual community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state,"

as recited by claim 3. The Duval Patent discloses an icon (108), as shown in Figure 4 (reproduced below for the Examiner's convenience), for initiating an anonymous phone call

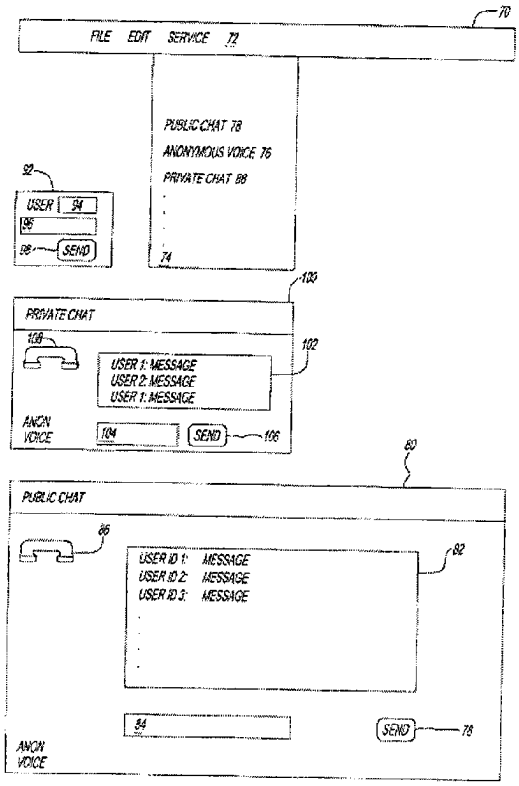


FIG. 4

(DuVal Patent, col. 9, lines 1-7). A person of ordinary skill in the art would instantly realize that the icon (108) disclosed by the DuVal Patent does not pertain to a "website-accessing

user avatar shown by the control means [that] indicates that the website-accessing user is not in a logged-in state," as recited in claim 3, because icon (108) is used to initiate a telephone call. Icon (108) does not indicate whether or not the user is presently logged in to the anonymous telephone communication system because the caller has no way of knowing if the callee is already logged into the system and is on a call with a third party using the system.

For all of the above reasons, the DuVal Patent does not teach, or suggest, that "when the website-accessing user is not logged into the virtual community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state," as recited by claim 3.

xi. <u>The Olivier Patent</u>

The Olivier Patent discloses "dynamically matching users for group communications based on a threshold degree of matching of sender and recipient predetermined acceptance criteria," wherein the method enables users to exchange group electronic mail by establishing individual profiles and criteria, for determining personalized subsets within a group (See Abstract of the Olivier Patent). According to the Olivier Patent, users establish subscriptions to an electronic mailing list by specifying user profile data and acceptance criteria data to screen other users, and when a user subscribes a web server establishes, and stores, an individualized recipient list including each matching subscriber and their degree of one-way or mutual match with the user (See Abstract of the Olivier Patent). The Olivier Patent discloses that when the user then sends a message to the mailing list, an email server retrieves 100% her matches and then optionally filters her recipient list down to a message distribution list using each recipient's message criteria, and the message is then distributed to matching

users (See Abstract of the Olivier Patent). Additionally, email archives and information contributions from users are stored in a database (See Abstract of the Olivier Patent). According to the Olivier Patent, the web server creates an individualized set of web pages for a user from the database, containing contributions only from users in his recipient list (See Abstract of the Olivier Patent). In other embodiments disclosed by the Olivier Patent, users apply one-way or mutual criteria matching and message profile criteria to other group forums, such as web-based discussion boards, chat, online clubs, USENET newsgroups, voicemail, instant messaging, web browsing side channel communities, and online gaming rendezvous (See Abstract of the Olivier Patent).

x. Summary of the Disclosures

The combination of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent does not teach, or suggest, (i)

> "a control means for issuing a community tag to the website-providing user, wherein the community tag causes a virtual tag community to be mounted on a website provided by the website-providing user when inserted in HTML data constituting the website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to the virtual community address of the website-providing user"

as recited by independent claims 1 and 7, and (ii)

> "issuing a community tag, by the community providing server, to a website-providing user, wherein the website-providing user is one of the website-accessing users who accesses the community providing server and registers with the virtual community in order to mount a virtual tag community on a website provided by the website-providing user, wherein the virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to a virtual community address of the website-providing user."

as recited by independent claim 8, and (iii)

> "when the website-accessing user is not logged into the virtual community, the website-accessing user avatar shown by the control means indicates that the website-accessing user is not in a logged-in state,

as recited by claim 3. Furthermore, the combination of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent does not teach, or suggest, the subject matter of new claim 13.

More specifically, the Matsuda Publication is limited to disclosing only a conventional virtual community. The Parry Publication is limited to teaching a site search engine that is mounted on a customer's website. The Parry Publication does not disclose mounting a virtual tag community corresponding to the virtual community address of the website-providing user. Thus, neither the Matsuda Publication nor the Parry Publication teaches, or suggests, either alone or in combination, a

> "virtual tag community mounted on the website provided by the website-providing user shows a part of a whole map of the virtual community, wherein the part of the whole map corresponds to the virtual community address of the website-providing user,"

as recited by claims 1, 7 and 8. Neither the Wu Document, the DuVal Patent, nor the Olivier Patent, make up this deficiency in the combined disclosures of the Matsuda Publication and the Parry Publication.

For all of the above reasons, the Examiner has failed to establish a prima facie case of obviousness against claims 1-4, 7, 8 and 10-13.

xi. No Legitimate Reason to Justify the Combination, and No Reasonable Expectation of Success Even if the Combination Were Made

A proper rejection under Section 103 requires showing (1) that a person of ordinary skill in the art would have had a legitimate reason to attempt to make the composition or device, or to carry out the claimed process, and (2) that the person of ordinary skill in the art would have had a reasonable expectation of success in doing so. PharmaStem Therapeutics, Inc. v. ViaCell, Inc., 491 F.3d 1342, 1360 (Fed. Cir. 2007). In this case, the Examiner has failed to establish a prima facie case of obviousness against Applicant's claimed invention because the Examiner has not established a legitimate reason to combine the disclosures of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent, and the Examiner has failed to demonstrate that a person of ordinary skill in the art would have had a reasonable expectation of success of arriving at Applicant's claimed invention even if the combination was made.

The present invention allows users who have registered with the virtual community, and who have accessed the website mounting the virtual tag community, to communicate virtually and mutually in the virtual tag community, which is a part of the whole map of the virtual community corresponding to the virtual community address of the website-providing user (See, e.g., claim 13). The Parry Publication, however, discloses only that a site search engine is mounted on the website. **There is no teaching in the Parry Publication from which to conclude that Parry's site search engine is used as a communication tool by those accessing a website**. On the contrary, persons of ordinary skill in the art would know that search engines are computer programs that retrieve documents or files or data from a database or a computer network, and that search engines are not generally used by website

users as a mechanism through which to communicate with one another (See, e.g., "Define: search engine – Google Search," *available at* www.google.com, downloaded March 13, 2010, 2 pages, a copy of which is filed herewith as "Exhibit A;" and "Search Engine," WordNet Search 3.0, *available at* http://wordnetweb.princeton.edu, downloaded March 13, 2010, 1 page, a copy of which is filed herewith as "Exhibit B").

The Parry Publication simply does not teach, or suggest, that the users who access the website on which the site search engine is mounted can communicate to one another on the website. As would be instantly appreciated by a person of ordinary skill in the art, because the Parry Publication only discloses mounting a site search engine on a website, and is silent regarding any communication features, users who access the website on which the site search engine is mounted cannot mutually communicate on the website.

Consequently, even if the combination of the Matsuda Publication and the Parry Publication was made, the combination would still fail to result in a method or apparatus that mounts a virtual tag community on a customer's website without alteration. Whether the combination of the Matsuda Publication and the Parry Publication would suggest mounting a virtual community on a website along with a search engine is immaterial with respect to the subject matter of Applicant's claimed invention, which mounts a virtual tag community on a customer's website without alteration. The Examiner has not addressed this issue.

For all of the above reasons, the combination of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent falls short of Applicant's claimed invention so the Examiner has failed to demonstrate a reasonable expectation of success of obtaining Applicant's claimed invention even if the combination

asserted by the Examiner is made. For the same reasons, the Examiner has failed to establish a legitimate reason for making the combination.

For all of the above reasons, the Examiner has failed to establish a prima facie case of obviousness against claims 1-4, 7, 8, 9 and 10-13.

IV. CONCLUSION

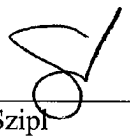
The Examiner has failed to establish a prima facie case of obviousness against claims 1-4, 7, 8 and 10-13 because (1) the combination of the Matsuda Publication, the Parry Publication, the Wu Document, the DuVal Patent, and the Olivier Patent does not teach, or suggest, each and every limitation recited in the claims, and because (2) the Examiner has not established a legitimate reason to make the combination, and because (3) the Examiner has not demonstrated that a person of ordinary skill in the art would have had a reasonable expectation of success of arriving at the claimed invention even if the combination asserted by the Examiner was made.

For all of the above reasons, claims 1-4, 7, 8 and 10-13 are in condition for allowance, and a prompt notice of allowance is earnestly solicited.

The below-signed attorney for Applicant welcomes any questions.

Respectfully submitted,

GRIFFIN & SZIPL, P.C.



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